

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISON**

JENNILYN SALINAS, MAURICE  
LYNNETTE, LINDSEY NGUYEN,  
DEANNA LORRAINE, J. CANN et  
al.

Plaintiffs.

V.

NANCY PELOSI, MITCH  
McCONNELL, CHUCK SCHUMER,  
MARK ZUCKERBERG, et al.

Defendants.

CIVIL ACTION NO. 6:21-CV-162

JURY TRIAL REQUESTED

**AGREED MOTION FOR EXTENSION OF TIME**  
**TO RESPOND TO MOTION TO DISMISS**  
**[relates to Document No. 148)]**

COME NOW, Jennilyn Salinas, Maurice Lynnette, Lindsey Nguyen, J. Cann, “P.P.,” “D.D.,” “T.M.,” “S.M.,” and “M.L.” (collectively, “Plaintiffs”), by and through their attorney, Paul M. Davis, to bring this Agreed Motion for Extension of Time to Respond to Defendants DSCC and DCCC’s Motion to Dismiss (the “Committees”), and respectfully represent the following:

## A. BACKGROUND

1. On May 28, 2021, the clerk entered a default against the Committees for their failure to respond to service of the above-captioned lawsuit.

2. On June 6, 2021, Plaintiffs agreed with counsel for the Committees not to oppose the Committees' motion to set aside the default in exchange for the

Committees agreement to allow Plaintiffs 30 days to respond to any motion to dismiss filed by the Committees. This agreement was confirmed by email on June 6, 2021.

3. The Committees filed their Motion to Dismiss (Doc. No. 148) (the “Committees’ Motion”) on June 11, 2021.

4. Plaintiffs have a voluminous amount of evidence and information to review and organize in preparation for filing their response to the Committees’ Motion.

5. 30 days from June 11, 2021 falls on July 11, 2021, which is a Sunday. Fed. R. Civ. P. 6(a)(1)(C) provides that if a deadline falls on a Sunday, it shall be extended to the fall on the next business day.

6. Therefore, pursuant to the agreement between the parties, Plaintiffs hereby request that the Court extend Plaintiffs’ deadline to respond to the Committees’ Motion to Monday, July 12, 2021.

7. Pursuant to the agreement between the parties and Fed. R. Civ. P. 6(a)(1)(C), Plaintiffs hereby requires that the Court extend Plaintiffs’ deadline to respond to the Committees’ Motion to July 12, 2021.

**WHEREFORE**, Plaintiffs pray the Court extend Plaintiffs’ deadline to respond to the Motion to Dismiss to July 12, 2021.

Respectfully submitted this June 14, 2021.

/s/ Paul M. Davis

Paul M. Davis

Texas Bar Number 24078401

paul@fireduptxlawyer.com

PAUL M. DAVIS & ASSOCIATES, P.C.

5720 Frisco Square Blvd., Apt. 2066

Frisco, TX 75034  
Phone: 469-850-2930

ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF CONFERENCE

I conferenced with counsel for the Committees by email on July 6, 2021 and counsel for the Committees agreed by email to extend Plaintiffs deadline to respond to their Motion to Dismiss by 30 days.

/s/ Paul M. Davis

Paul M. Davis

CERTIFICATE OF SERVICE

I certify that I have served the foregoing motion on all counsel of record who have made appearances in this action to date via the court's ECF notification system on June 14, 2021.

/s/ Paul M. Davis

Paul M. Davis